

WHYTELIST.ME

PRIVACY POLICY

This privacy policy was last modified on 17 January 2025.

whytelist.me is owned and operated by, and is a trading name of, Kapturepoint Limited, a limited liability company incorporated and registered in England and Wales with company number 14184812 whose registered office is at 9 Oxford Court, Manchester, England M2 3WQ.

We know that you care about how your personal data is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By visiting the whytelist.me website and using the whytelist.me services, you acknowledge that you accept the practices and policies outlined in this Privacy Policy.

We reserve the right to update this Privacy Policy from time to time. Changes will be made to this page by updating the last modified date above and posting the updated Privacy Policy on this page. We may email you from time to time with notification of changes to our Privacy Policy but it is your responsibility to check this page regularly and any changes made to it.

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Personal Data That We Collect and Use

Kapturepoint collects and uses the following information:

- To provide our services, including details of any service updates:
 - Names and contact details
 - Payment details (including card or bank information for transfers and direct debits)
 - Transaction data including details of the services you have purchased from us
- For marketing purposes:
 - Names and email addresses
 - Marketing preferences

- To comply with legal requirements:
 - Names and contact details
 - Transaction data including details of the services you have purchased from us

You provide some of this data directly, such as when you create an account, ask us for an online quotation, or contact us for support, or when you attempt to send an email communication to a recipient whose organisation is protected by the whytelist.me service. If we obtain data from third parties, such as research companies, we will seek assurance from them that they have a lawful basis for sharing your data with us before we process the data.

We do not collect any special categories of personal data about you.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

Lawful bases for processing Personal Data

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal data. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect [Your rights](#), which are set out further below.

Our lawful bases for collecting or using personal information to **provide our services, including details of any service updates**, are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The service that we provide is to protect email recipients from unwanted/unsolicited emails and malicious/scamming emails. The service we offer helps reduce the risk of people receiving these types of emails. We act as a filtering service to try and help people not be bombarded with emails from

people they are not expecting, and to reduce the risk presented from malicious/scamming emails.

Our lawful bases for collecting or using personal information for **marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. You have the right at any time to opt out of our use of your personal information for marketing purposes.

Our lawful bases for collecting or using personal data to comply with **legal requirements** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Who We Share Personal Data With

We share data with third parties (including Microsoft) if the Subscriber uses software, applications and/or website content of, or products and services from, such third parties to enable the Subscriber to interact with the Services.

International Transfers

If we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

How Long We Retain Your Personal Data

We store personal data for a period of 7 years from the end of the last company financial year to which they relate for the purposes of satisfying any legal, regulatory, tax, accounting, statutory record keeping, audit or other requirements.

Your Rights

Under data protection laws, you have certain rights in respect of your personal data which may vary depending on the lawful basis upon which we are relying to process your personal data :

- Right of access: You have a right to request copies of any personal data about you that we process, and other information about, for example, how we obtain personal data and any third parties with whom we share your personal data.
- Right to rectification: You have the right to request that we correct or delete incomplete or inaccurate data about you.
- Right to erasure: You have the right to request that we erase your personal data (where applicable) or to restrict processing in accordance with data protection laws.
- Right to restriction of processing: You have the right to ask us to limit how we can use your personal data.
- Right to object to processing: You have the right to object to the processing of your personal data.
- Right to data portability: You have the right to ask that we transfer any personal data we hold about you to another organisation or to you.
- Right to withdraw consent: You have the right to withdraw your consent at any time where we are using consent as our lawful basis for processing your personal data.

To exercise any of these rights, please contact: DP@whyte.com. We must reply to you without undue delay and, in any event, within one month of your request. We may need to ask you to provide further information to sufficiently identify you and the relevant personal data before we are able to act on your request.

If, after raising a rights request or complaint with us, you are unhappy with how we use your personal data, you can learn more about your rights and raise a complaint with the ICO here: <https://ico.org.uk/your-data-matters/>